

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

AMAZON.COM, INC. and AMAZON DATA
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN WATSON;
STERLING NCP FF, LLC; MANASSAS NCP FF, LLC;
NSIPI ADMINISTRATIVE MANAGER; NOVA WPC
LLC; WHITE PEAKS CAPITAL LLC; VILLANOVA
TRUST; CASEY KIRSCHNER; ALLCORE
DEVELOPMENT LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON NELSON;
JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

800 HOYT LLC,

Intervening Interpleader Plaintiff /
Intervening Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC; BW
HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA
SERVICES, INC.,

Interpleader Defendants / Interpleader
Counter-Plaintiffs.

**BRIAN WATSON’S MOTION TO COMPEL NON-PARTY IPI PARTNERS, LLC’S
COMPLIANCE WITH RULE 45 SUBPOENA**

Movant Brian Watson (“Mr. Watson”), by counsel and pursuant to Federal Rule of Civil
Procedure 45(d)(2)(B)(i), hereby moves this Court for an order compelling non-party IPI Partners,

LLC (“IPI”) to comply with a subpoena *duces tecum* (the “Subpoena”) served by Movant in connection with this case.

As detailed in the accompanying Memorandum of Law in Support of Brian Watson’s Motion to Compel, the parties have met and conferred in an effort to resolve this dispute and have been unable to reach a resolution. During meet-and-confer discussions regarding IPI’s response to the Subpoena and in subsequent correspondence, IPI has stated that it will not produce several categories of documents that are responsive to the requests contained in the Subpoena. Mr. Watson therefore seeks an order of this Court compelling IPI to comply with the Subpoena by producing materials that are both responsive and necessary to Mr. Watson’s defense in the above-captioned litigation. IPI consents to the filing of this Motion in this Court.

In support of this Motion to Compel, Mr. Watson submits the accompanying Memorandum of Law, the Declaration of Jeffrey R. Hamlin in Support of Brian Watson’s Motion to Compel, and accompanying exhibits. Mr. Watson also submits a Proposed Order granting this Motion to Compel and a Notice of Hearing.

WHEREFORE, Mr. Watson respectfully requests that the Court grant his Motion to Compel.

Dated: April 11, 2022

Respectfully submitted,

/s/ Jeffrey R. Hamlin
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